

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS NIETO TO QUESTIONS POSED AT HEARINGS

The United States Postal Service hereby provides the responses of witness Nieto to questions posed by the Florida Gift Fruit Shippers Association and the American Business Press at the hearings on October 14, 1997.


Each question is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 22, 1997

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO QUESTIONS POSED  
DURING ORAL CROSS-EXAMINATION

**Tr. 7/3507 (Florida Gift Fruit Shippers Association)**

"Mr. Chairman, I would request that the Postal Service identify the four TRACS tests and the two TRACS tests and the one TRACS test that are referred to by the witness in answer to our interrogatory T-2-41."

**Response:**

Please refer to the attachment to this question.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO QUESTIONS POSED  
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**Response to question posed at Tr. 7/3507, lines 2-5.**

There were four Intra-BMC TRACS tests in which a portion of the truck was vertically used up to 96":

TESTID	ACCT	FTYPE	UNLOAD	EMPTY	REMAIN	WHEELED	PALLETS	SACKS	EXPRESS	OTHER	NWHEELD	NPALLETS	P1HEIGHT	P2HEIGHT	HSACKS	HEXPRESS	HOTHER	AVG_HT
02198BM	53127	SCF	55	45	0	40	5	10	0	0	9	2	14	11	106	0	0	72.77
05138JS	53127	BMC	85	15	0	50	15	2	0	18	11	3	49	49	34	0	96	72.13
06022XX	53127	BMC	100	0	0	30	50	5	0	15	6	11	72	48	30	0	96	67.50
06532CP	53127	SCF	100	0	0	60	0	20	0	20	13	0	0	0	96	0	96	81.60

There were two Intra-BMC TRACS tests in which the entire truck was vertically used up to 96":

TESTID	ACCT	FTYPE	UNLOAD	EMPTY	REMAIN	WHEELED	PALLETS	SACKS	EXPRESS	OTHER	NWHEELD	NPALLETS	P1HEIGHT	P2HEIGHT	HSACKS	HEXPRESS	HOTHER	AVG_HT
06188KK	53127	BMC	100	0	0	0	0	0	0	100	0	0	0	0	0	0	96	96.08
77736UY	53127	BMC	100	0	0	0	0	100	0	0	0	0	0	0	100	0	0	100.00

There was one Inter-BMC TRACS test in which a portion of the truck was vertically used up to 96":

TESTID	ACCT	FTYPE	UNLOAD	EMPTY	REMAIN	WHEELED	PALLETS	SACKS	EXPRESS	OTHER	NWHEELD	NPALLETS	P1HEIGHT	P2HEIGHT	HSACKS	HEXPRESS	HOTHER	AVG_HT
08188HE	53131	BMC	90	10	0	30	0	10	0	50	9	0	0	0	55	0	97	84.00

**Variable definitions:**

TESTID Test ID  
ACCT Account  
FTYPE Test Facility Type  
UNLOAD Percent of truck which was unloaded  
EMPTY Percent of truck which was already empty  
REMAIN Percent of truck which was not unloaded  
WHEELED Percent of truck which contained wheeled containers which were unloaded  
PALLETS Percent of truck which contained pallets which were unloaded  
SACKS Percent of truck which contained loose sacks which were unloaded  
EXPRESS Percent of truck which contained loose Express items which were unloaded  
OTHER Percent of truck which contained other loose items which were unloaded  
NWHEELD Number of wheeled containers unloaded  
NPALLETS Number of pallets unloaded  
P1HEIGHT Height of the first of up to two sampled pallets  
P2HEIGHT Height of the second of up to two sampled pallets  
HSACKS Height of the loose sacks  
HEXPRESS Height of the loose Express items  
HOTHER Height of the other loose items  
AVG\_HT Average height, which is calculated as the weighted average of the above heights (the two pallet heights are first straight-averaged together; a standard height of 72" is used for wheeled containers), weighted by floorspace percentage for each itemgroup (Wheeled, Pallets, Express, Sacks, Other).

\* Note that a height of greater than 96" (e.g., 100, or 106) reflects a DCT's visual estimation of a height which was too high to actually reach with a tape measure. For the purposes of this identification of tests in which a portion of the truck or all of the truck was filled to the ceiling, these measurements are assumed to be indicative of a true height of 96". This is not a reason for concern as heights are not used in the expansion process except in the calculation of the cubic feet of pallets.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO QUESTIONS POSED  
DURING ORAL CROSS-EXAMINATION

**Tr. 7/3531 (American Business Press)**

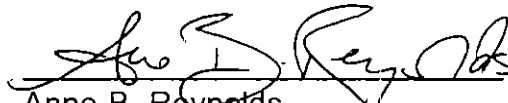
"I was wondering if it would be possible for the witness or for the Postal Service to provide some written substantiation of her estimate that in quarter 4 of 1995 the periodical density factors were updated, and if so, what factors were used?"

**Response:**

The density factor for PQs 1-3 was 17.543 lbs/cuft, from the Form 22 Density Study of PQ4, FY92. Updated density factors for periodicals were used in PQ4 of FY96 with the implementation of the new mail classifications into the data collection systems. The density used in PQ4 of FY96 was 18.262 lbs/cuft. A description of the study and methodology used can be found in Docket No. MC95-1, LR-MCR-13. This study was conducted in PQ4 of FY94.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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